

Re: The Safer Affordable Fuel Efficient (SAFE) Vehicles
Proposed Rule for Model Years 2021-2026

October 24, 2018

The Honorable Elaine Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, D.C. 20590

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Secretary Chao and Acting Administrator Wheeler:

Americans for Tax Reform voices its support for the Safer Affordable Fuel Efficient (SAFE) Vehicles Proposed Rule for Model Years 2021-2026. We believe the SAFE Vehicle Rule is a necessary fix to the Congressionally-mandated Corporate Average Fuel Economy (CAFE) Standards and is a vital step towards ensuring consumer choice in the auto industry.

We support the Trump Administration's effort to correct the unreasonable and unattainable CAFE standards by maintaining the MY 2020 standards through MY 2026 and view this proposed rule as a recognition of reality that the current CAFE standards would never have been met in the first place.

Adopting the SAFE Vehicles Proposed Rule promotes consumer choice over bureaucratic dictates. Auto manufactures are now coerced by the government to design cars and trucks to the preference of bureaucrats rather than the needs of consumers. Consumers should be free to choose the car that best fits the needs of their lives. The proposed rule takes steps towards protecting this principle.

The current standards go beyond their original intent and are outdated. The mandate was created in 1975 during a time of great oil scarcity and designed to make the U.S. less dependent on foreign oil. Thankfully, we now live in a period of energy abundance where the U.S. is the world's leading producer of both natural gas and crude oil. We no longer live in a time where gasoline rationing is occurring, the mandate has outlived its intended purpose and should be corrected.

Adopting the proposed rule reduces a hidden tax on consumers. According to NHTSA and EPA's own estimates, adopting the proposed rule will save \$500 billion in costs for the U.S. economy. Technical assessments that were initially undertaken by the Obama Administration indicate that the current CAFE standards, left unchanged, raise the average cost of a vehicle by at least \$3,000. This artificial price increase limits car ownership by pricing some consumers out of the market entirely. For the majority of Americans, owning a car isn't a luxury, but rather a necessity of everyday life. The government should not be taking action that actively seeks to create barriers on vehicle ownership.

The proposed SAFE Vehicle Rule restores proper federalism by removing California's ability to dictate national policy. If we are going to have national standards in our auto industry, they should be set by federal policymakers. Lawmakers in Sacramento should not have the authority to force consumers in other states to only purchase vehicles approved by California. No other state has this ability, and no state should be able to dictate what vehicles the citizens of another state are allowed to own. **California's waiver must go, we urge the administration pursue this outcome in court.**

For these reasons, Americans for Tax Reform strongly supports the U.S. Department of Transportation and the U.S. Environmental Protection Agency's SAFE Vehicles Proposed Rule for Model Years 2021-2026 and urge the administration to adopt the rule.

Thank you for your consideration. If you have any questions, please do not hesitate to contact me or ATR's Federal Affairs Manager Michael Palicz at mpalicz@atr.org or at 202-785-0266.

Onward,

A handwritten signature in dark ink, appearing to read 'G. Norquist', written in a cursive style.

Grover G. Norquist
President, Americans for Tax Reform